

UNITED STATES DISTRICT COURT

For the

Eastern District of Oklahoma

Honorable Ronald A White, Chief Judge – Patrick Keaney, Clerk of Court

Case No. CV 19 - 244 - RAW

Jury Trial xxxx yes

DEFENDANTS INFORMATION & BACKGROUND TO THIS COMPLAINT

Party to this complaint, Plaintiff/Appellee

Mary Kathryn Johnson, Pro Se

4803 S Gum Avenue

Broken Arrow, Oklahoma 74011

254-231-9193 or 918-940-7699

Msmj_1@hotmail.com

FILED

AUG - 1 2019

PATRICK KEANEY
Clerk, U.S. District Court

By _____
Deputy Clerk

Defendant(s) to this complaint:

- 1. Wagoner County, et al (Wagoner County, Board of Commissioners/ Fiscal Administrators, District Attorney, Court Clerk, County Sheriff, 15th District Court and Affiant/Cooperating Witness who swore a bench warrant was needed) C/o Kim Hall, 1st Assistant District Attorney for Board of Commissioners Attorney for Wagoner County - 307 E Cherokee Street/ PO Box 249 - Wagoner, Oklahoma 74477 - Phone 918-485-4508**
- 2. Patti Oertle-Phaneuf, Defendant - President - D.B.A/The Key Group, Inc. - 9717 E 42nd Street - Tulsa, Oklahoma 74146 - (918) 747-0000**
- 3. Martin A. Vaughn, Defendant/Incorporator/ Estate of Martin A. Vaughn, Deceased or D.B.A Pertusa Energy or Incorporation Agent for - National Background Reporting and/or Fiscal Incorporation Agent for National Background Reporting - 6732 East 41st Street - Tulsa, OK 74145 918.794.4777**
- 4. Michael Keller, Defendant - President Kellpro, Inc. (580)255-5553 101 S 15th Street - Duncan, Oklahoma 73533**

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Mary K Johnson, Pro Se vs Wagoner County, etal/Complaint
Page Two (2) Background of Defendant(s) to this complaint

Statement of Facts:

I Mary K Johnson do solemnly swear and affirm that the information I am presenting to this Honorable Court is true and correct to the best of my recollection, concerning the events of a life experience with **Wagoner County, etal, Defendant(s)** regarding all, at present two (2) active bench warrants submitted for my arrest without probable cause, false report of action, violation of double jeopardy/ticket already paid - Nolo Contendere - filing eight (8) years after the payment without regard to the truth - publishing this fraudulent information, slander, defamation and conspiracy to commit fraud, as well as , malicious prosecution from false testimony of affiant who caused the court to issue warrants; it appears, perjured testimony that caused this action. Wagoner County's refusal to reverse the error that would avoid court action; extreme harm and denial of my right to life, liberty and the pursuit of happiness by violating these rights of the US Constitution 4th, 5th, 6th and 8th amendments, as well as, Fair Credit Report Act regulations, causing extreme loss from 2001 to present and even before in 1994 keeping a twenty-five (25) year old adverse action alive and refusal to accept the notice to them by Mary K Johnson that I paid the Department of Public Safety for the ticket issued to me by Officer then/now Major Blish, to Department of Public Safety/DPS in 1994 and plead Nolo Contendere.

Until I get further records I don't remember getting a ticket for Driving Under Suspension (DUS). I don't believe this was issued to me but if it was it was done in error and would have been dismissed; according to DPS (Department of Public Safety) I didn't have a suspended license in 1994 and because I was able to get a driver's license in Texas when I moved in 2005, I believe this is question is true, and based on DPS information obtained a true violation of *Oklahoma Department of Public Safety "To preserve your rights and privacy under the Driver's Privacy Protection Act, 18 U.S.C., Sections 2721 through 2725"* **18 U.S. Code § 2724. Civil action -**

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Mary K Johnson, Pro Se vs Wagoner County, etal

Background of Defendant(s) to this complaint /Statement of Facts Cont:

Wagoner County Continued:

Based on the face of testimony and facts presented in this complaint, Wagoner County, etal may have manipulated the DUS ticket and issued a warrant under false pretenses

As per: Oklahoma Department of Public Safety "To preserve your rights and privacy under the Driver's Privacy Protection Act, 18 U.S.C., Sections 2721 through 2725"18 U.S. Code § 2724. Civil action (a)Cause of Action.—A person who knowingly obtains, discloses or uses personal information, from a motor vehicle record, for a purpose not permitted under this chapter shall be liable to the individual to whom the information pertains, who may bring a civil action in a United States district court. (b)Remedies.—The court may award—(1)actual damages,

I attest and affirm Wagoner County published a defamatory report and refused to accept my many attempts to avoid court action. They approved the violation of my rights and are still reporting this defamatory and possibly illegal information and allowing others to do so as well. Their obvious intent is to harm me. For the sake of "due process", I/Mary K Johnson, need them stopped.

**Concerning Patti/Patricia Oertle-Phaneuf, President
Defendant (KEY GROUP PERSONNEL)**

I believe that the written and verbal agreement to hire me and waivers, application and testing given to me by Key Group wasn't credible and this agency breached, and in some cases supported an intent to defraud my employment efforts.

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Background of Defendant(s) to this complaint/Statement of Facts Cont:

KEY GROUP CONTINUED:

This agency appears to have breached the “**stand-alone disclosure**” **requirement of Federal Court Reporting Act.** (*Hillson v. Kelly Services, Inc.*, and denied me equal employment opportunity by denying me “right to work” due to slander, excluding me as a potential employees during the recruitment process. Violated my rights under “right to work” and “at will” employment requirements, as well as violated my 14th Amendment rights “equal protection under the law” and Title VII, protection from discrimination as a protected class.

When I applied for employment by the Key Group I was given a data entry test that resulted in 7000 keystrokes of characters with 98% accuracy. I was told by the representative that if I passed the drug and background test I could expect to be assigned to positions that fit my skill category. The defendant (Key Group) had me sign several forms with disclaimer agreements. Key Group didn’t tell me that they would use old, defamatory and FCRA violations to discriminate against me and harm my employment reputation; deny me that employment and use unfair employment practice regarding this report. They didn’t acknowledge that their agencies would not allow my application to be processed because of their report being shown and the results, nor did they report that they would discriminate against me (69 year old black female) unlike any other standards they use for all their other applications for employment.

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Key Group Continued:

Just like financial credit reports, their actions allowed other companies to see the outcome of their search. These reports wander around and other agencies can see or use the information and make decisions based on what they determined.

This activity also makes the privacy actions null and void, and reporting agencies will send this information out to their other customers. This is a catch 22 that never stops until you stop it in court; even then if you sue, no company or agency wants to touch you and it ends up being like workman's comp complaints.

You are an outcast in the World of Work in any state depending on the number of cities the reporting agency touches. The thought of never being able to work again strikes a huge fear and concern for my future. Social Security won't pay for all an individuals needs and working can fill in the gaps. My concern is will I ever recover from this and how? They have caused me a great amount of harm for several years and in many venues.

They used the information published by Wagoner County and Kellpro (Exhibits from National Background Reporting). This agency sent me an adverse action report that stated that I agreed to this process of background check with just a title " Key Group" as the issuer of this letter, no signature. Key Group also reported that I agreed to their application process. However, I did not agree to being harmed by unequal, defamatory, violations of my rights, breach of employment application process and fraud.

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KEY GROUP CONTINUED:

I contend that Key Group committed a fraud against me, breached the verbal and written requirements of their application for employment ; had me to sign waivers under false pretenses and fraud, and violated my rights under color of law or administrative practices, as follows: violated Title VII in their application process, denying me equal and fair employment application processing ; violated the 8th and 14th Amendment “equal protection” and joined Wagoner County, etal in violating my right to “due process” ,accused of being guilty of a crime when I was not..

Their representative led me to believe that the forms I was signing were required and credible. I signed the information thinking it was credible and wouldn't harm me. My thought was, I don't have any background issues and I just knew with my test scores, I would be working and able to catch up with my current state of little to no income. I was so excited and hopeful of a good outcome.

In Hillson vs Kelly Services, Inc. the FCRA's requirements in Section 1681b(b)(2)(A)(i) that a portion of this agreement was in violation as not being a “stand-alone document” consisting solely of the disclosure (“To the fullest extent permitted by law, I release Kelly, its employees, agents, successors and assigns, from any and all claims . . . in any way related to the procurement of a consumer report about me, or any subsequent investigation(s) of my background or personal history.”)

By signing these waivers, let it be known, I did not release Key Group to lie and deny the truth in their reporting information of me; to receive and penalize me for a false, defaming report that would deny a potential employment opportunity, a report that would discriminate against me in their application process.

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Key Group Continued:

I did not expect this type of behavior because I didn't think I had anything to hide. In 1994 I paid these tickets and in my mind they were long forgotten. I didn't think about these tickets because I had sent a letter to Wagoner County and didn't feel this was an issue any longer. I knew about the tickets in the past but felt this issue was cleared up.

To my surprise this old information was pulled and used to deny my employment potential. Key Group used this lie and published report without checking to see if it was true, they sent me a letter telling me that if I corrected this issue I may be considered. Really. So I began another search and check with Department of Public Safety to clear this matter. I never gave it any thought when I applied. I was confident it wasn't an issue any more.

The Key Group agent (she) told me that my chances for employment were good and if the background report and drug screen was clear, she would recommend me for work.

I did not release **Key Group** to use me for harm or defame my employment character. This agency not only lied to me but lied about me and breached the Federal **41 U.S. Code § 6503**. Breach or violation of required contract terms in their verbal and written agreement not to discriminate, as well as, comply with Federal Credit Reporting Act.. They presented their agency as credible and denied discriminatory actions.

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KEY GROUP CONT:

By using false, defamatory and outdated information against me **Key Group** also violated the False Claims Act of 1863; **although old**, this is another point concerning their harm to me and in this act it was clear; defraud was eliminated in 1863 and I have to believe it is relevant in the law today.

In the application process they advised me of the actions they would take and requested my permission while assuring me that I would be given an Adverse Action report in compliance to the Fair Credit Reporting Act. The report was false and with limited restorative processing. This agency used me for a fraudulent activity and in violation of Fair Credit Reporting, they also breached their agreement to give me a non-discriminatory employment application process. They did not.

I am praying to this Honorable Court to notice that on its face by (Exhibit National Background Reporting) presented a report that any reasonable person would questioned As a reasonable person a report with a 1994 history and a 2001 date to issue a warrant would have sent "red flags" flying. This report would have caused a reasonable person to wonder why I was given a Texas driver's license while these issues remained.

The writer of the letter from National Background Reporting only signed "Key Group". That signature appeared to be something that was not credible, as though someone was trying to hide this action. How can you expect someone to respond to your letter without who to respond to? To me it was as though you didn't want me to find or research the truth. Who, What, When, Where and Why had been omitted.

This letter also seemed to imply a certain justified action in requesting this report as one of the determining factors in my hiring, the letter never stated/reported, what the "other" issues were, leaving me with an incomplete Adverse Action option to correct.

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Key Group Continued/concluded:

The Key Group seemed oblivious to the harm done to me. How can you correct or change an adverse action without the information needed to do so. This agency presented as a fraud and still in violation of Fair Credit Reporting, left out all the issues and who to contact in order to correct this problem.

Also in this report was the FBI information (National Background Reporting) I am also including in this complaint the FBI Agency Report with their letter at my request. This report will show no adverse action listed by Wagoner County, with no warrants out for my arrest. Also, please note that the only adverse issue in the report was the one from Wagoner County, etal, published by Kellpro, Inc at www.odcr.1/Kellpro © 2019 and OCSN.net (Search no-OCSN counties)/Oklahoma State Court records website on behalf of Wagoner County.

DEFENDANT: National Background Reporting/also known for:

Martin A. Vaughn, Defendant/Incorporator/ Estate of Martin A. Vaughn,
Deceased or D.B.A Pertusa Energy or Incorporation Agent for -
National Background Reporting and/or Fiscal Incorporation Agent for
National Background Reporting - 6732 East 41st Street - Tulsa, OK 74145
-918.794.4777

NATIONAL BACKGROUND REPORTING - This agency has many layers to it. The above information revealed by the State of Oklahoma Secretary of State that National Background Reporting was also previously connected to Pertusa Energy and Martin A Vaughn who has many attachments to other companies and may be deceased, at one time set this agency in place and their name was changed. However, the agency in question as related to my complaint is the reporting done by **National Background Reporting(NBR) for Key Group Personnel, Tulsa Oklahoma.**

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NATIONAL BACKGROUND REPORTING Continued:

The effect of their work concerning me presented itself as substandard in reference to their advertised website; their report was defaming, slanderous, old, untrue, harmful, illegal, and responsible for the violation of my employment application opportunity.

Because of this harmful report and illegal act of employment application discrimination it appears to have prevailed in Key Group's decision, as their report was the only copy sent with Adverse Action letter from Key Group in their refusal to hire me, and by this action I was denied **"right to work"** **"at will"** protection in the State of Oklahoma, along with violation of Fair Credit Reporting Act and Title VII, no discrimination policy.

I would ask this Honorable Court to consider their using any agreements I signed to allow them to do a background check concerning me illegal and fraudulent. An act of coercion under the cover of law and their use and actions were done illegally in clear violation of Fair Credit Reporting in the United States.

The Supreme Court. (See)(See Brown v Board of Education) "equal protection" 14th Amendment. Bolling v Sharpe (1954) As stated by "equal protection" under the 14th Amendment states these laws supercede **"right to work"** and **"at will,"** if there was illegal activity. The meaning of the Equal Protection Clause has been the subject of much debate, and inspired the well-known phrase "Equal Justice Under Law". **Breach of Contract:** An existing contract between an employer and employee can subvert at-will employment provisions, and does, it also subverts agreement to not come against Key Group Personnel Services for their use of this agency and their defaming, fraudulent reporting practices.

Key Group ordered this report from them/**NBR**, and on its face appears to be condoning the report, causing me to consider a conspiring effort by the hiring agency and reporting agency.

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National Background Reporting Continued:

Question: Does National Background Reporting and Key Group have more than business and customer connections? Is there another relationship here, maybe relatives or old friends? This may be an issue and goes to the intent to unite in the illegal actions of Key Group and NBR and violations under California **Group Boycotting**: competitors allying to boycott any specific entity (me)

NBR/This agency also presented old information that caused great harm in employment opportunities and was fraudulent, however they present themselves as an agency that: (see website)

"We are dedicated to our clients success. From the entrepreneur down the street, to the Fortune 500 company, National Background Reporting is the recognized professional provider of business-to-business pre-employment screening. Our alliances have more than 15 years in the background check sector and are forerunners since the emergence of this industry. How have we maintained integrity with our clients? By becoming a dedicated extension of your HR department, your business can service your customer knowing National Background Reporting has provided the most up-to-the-minute information on potential employees."

Based on this illegal reporting without my authorization this website is not only poor at providing background information but breaks the law while doing so.

According to Stevenson vs TRW if you publish a lie it's defamation and causation for mental distress. Not only did **National Background Reporting** publish the incorrect information but they submitted it to Key Group and (Mary K Johnson) was denied an employment opportunity that caused and is still causing great harm.

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National Background Reporting continued:

The false reporting by this agency was defaming, slanderous and a breach of contract that violated the Oklahoma State reporting and corporation laws , as well as, Federal Credit Reporting Act, along with Violation of my 14th amendment right of " Equal Justice Under Law". and Title VII not to be discriminated against.

Based on the waiver I signed there was a breach of contract and the right of this agency to pull a report on me was and should have been void. By doing this they violated my right to privacy in the Fair Credit Reporting Act process.

Breach of Contract: An existing contract between an employer and employee can subvert at-will employment provisions. Background reporting should be done without prejudice, defaming or malicious intent under Fair Credit Reporting.

By reporting a lie, they participated in a subversive act and I believe National Background Reporting violated my rights in their reporting process and defamed my employment character that will take many years to recover from. I call this Honorable Court to consider:

These types of reports are pulled like a credit report. A bad report has a boomerang effect; it rolls around and other companies who do reporting may use it, or use the service to see who will check on you. You can look in these reports, they looked at other agencies reports about me. These agencies are notorious for submitting old and outdated information but in case of defamation and fraud this is an issue to be corrected. Fair Credit Reporting has a statute of limitations on them but a bench warrant is forever and no matter how old it can wreck a life, especially if it is a lie.

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DEFENDANT, Michael Keller- President Kellpro, Inc.
National website /www1.odcr.com

This website and the information presented on it comes from all the court systems, and is used by law officials, State of Oklahoma/OCSN.net, as well as, individuals who want to see public records. It also updates its information, no matter how wrong, revealing seemingly new information from County Courts or agencies; for example there was a records check concerning me on 3/2019 and added to the report was (OSW) Outstanding Sheriff Warrant, "see Sheriff for details" all highlighted in red. Mr. Keller's website is well known and used by private citizens, corporations, reporting agencies and law enforcement officials which is where I got the referral from the Creek County Sheriff Deputy.

Again I contend that Mr. Keller's website violated , Oklahoma Department of Public Safety "To preserve your rights and privacy under the Driver's Privacy Protection Act, 18 U.S.C., Sections 2721 through 2725"18 U.S. Code § 2724. Civil action (a)Cause of Action.

Mr. Keller's website /www1.odcr.com published past and present information concerning false injurious information obtained from Wagoner County without regard to the truth with an intent to continue to malign and destroy my driving history and potential criminal actions by updating his/Michael Keller's website to include any new information from Wagoner County, however wrong or injurious.

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Michael Keller, Defendant - President Kellpro, Inc./Continued:
National website /www1.odcr.com

Mr. Keller's website defamed, gave way to a lie/libel and caused me a great deal of injury in the publishing of these paid citations/one is questionable and may be a fraud and like a credit report; goes on, and on, and on.

Mr. Keller's website was constructive in denying me employment, credit denials and has a potential for "clear and present danger"

As per; Justice OLIVER WENDELL HOLMES JR., writing for the U.S. Supreme Court in Schenck v. United States, 249 U.S. 47, 39 S. Ct. 247, 63 L. Ed. 470 (1919), stated: "The question in every case is whether the words used are used in such circumstances and are of such a nature as to create a clear and present danger that they will bring about the substantive evils that Congress has a right to prevent." "OSW"/Outstanding Sheriff Warrant isn't something that you have to guess if it's dangerous. In the State of Oklahoma people have been and are being killed by deadly force if they are perceived as a criminal.

When stopped by a police officer and a warrant is detected you can expect to be arrested and depending on the personnel you get in some parts of Oklahoma and the United States, as result of a cited warrant, it makes the individual seem dangerous and a potential target of deadly force; deadly force has increased in certain areas where law enforcement personnel have reported; being afraid and even negligent in attempting to deal with a wanted individual, especially females and minorities suspects.

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Michael Keller, Defendant - President Kellpro, Inc. /Continued:

National website /www1.odcr.com/Continued:

Michael Keller, Defendant - President Kellpro, Inc. /Continued:

National website /www1.odcr.com/Continued:

The publishing Mr. Keller's information is open to the public, at present, in my case it is in violation of the Fair Credit Reporting Act; State of Oklahoma anti hate and discrimination regulations, as well as EEOC violations of discrimination. It also violates my due process and equal protection under the 14th Amendment.

This websight denied my rights as a US Citizen under the preamble "Life"; what if I am unfortunate enough "heaven forbid" to be arrested by deadly force because some officer or deputy volunteer, sees me as a danger and handles me incorrectly, due to a reported lie and I'm killed.

What's the response, oops "my bad", I hope this Honorable Court sees how dangerous and painful this is for me and allows me to present my case in court to stop the harm being done to me and my family.

Mr. Keller's website opens it's records to anyone who can get on the website (/www1.odcr.com). So any enemy, unstable or discrediting individual is welcomed to use this site. Anyone can get my information. If someone wanted my information and spread it all around the World they could and invite their friends by passing out the website address.

This information does not discriminate against the user. If someone were mentally unstable or suffered from psychological issues or just didn't like me because of personal issues; this website would feed that process. Even if I'm not guilty this information would present me as being guilty and who would be discerning or willing to see if it is true; maybe a reasonable person but these days some are missing that mark.

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Michael Keller, Defendant - President Kellpro, Inc. /
National website /www1.odcr.com/Continued:

It is obvious by the old date and the published use of this information, no research was done to see if the ticket information posted was still relevant or had been paid, or even true. This behavior is also a clear violation of the Fair Credit Reporting Act. Since Wagoner County never served me with not showing up in court and issued the warrants without probable cause this website owner/Michale Keller, Kellpro, Inc. didn't bother to check if I had any other driving histories. Their behavior also goes to intent to publish the negative and false information, not the truth. I wonder how many other's have been harmed as a class by this agency?

Material Fact, (Copy of Texas Driver's License, as presented to Key Group)

In 2005 I turned in my old Oklahoma DL and received Texas DL without a hitch. No adverse actions reported by Department of Public Safety and I was approved for driver's license in Texas. Oklahoma has a comprehensive driving reporting system that is used from State to State so if these warrants were relevant, why didn't it come up on Texas' background check for the new driver's license? And it is a well known fact all states check you out before they issue their driver's license to you.

Since I had current Texas Drivers License and hadn't received a notice of my potential arrest I was not aware of any problem(s). In 1994 I paid the ticket(s) (not sure about the DUS ticket) I remember paying the ticket for improper turn by pleading nolo contendere and forget the whole issues as being over
To date 7/31/2019 /www1.odcr.com never published the truth, only Wagoner County's lie. How long do I have to be subject to this injustice?

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Michael Keller, Defendant - President Kellpro, Inc. National website
www1.odcr.com/Continued:

If I had not been stopped by a Creek County Sheriff Deputy 8/1 or 8/2, 2017.

I would never have known I had a problem in Oklahoma, or about the website that was producing this information.

This deputy (A Reasonable Person), ran a check on me from this website and gave me the address to check if the information was correct (www1.odcr.com). The deputy reported that my Texas Driver's License matched another Mary K Johnson with a similar date of birth; with two (2) active warrants. He told me to call Wagoner County, I did the next business office date, to no avail (see copies of email in Exhibits).

Mr. Keller's website, just like Wagoner County has caused me great harm and maybe even endangered my life by this lie with no regard to the truth.

Coffin vs. U.S. (1894) appears very old but even in 2019 the concept of innocent until proven guilty has escaped me in Wagoner County and all these defendants, especially www1.odcr.com. They have used their adverse action reports and behavior to harm me.

I paid the improper turn ticket, but I don't remember the DUS and according to a clerk at Department of Public Safety they don't either. Again I ask the question, who issues a bench warrant for a fraud/DUS ticket whether dismissed or manipulated, something is really wrong here, what and why; who does this without the truth?

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**Michael Keller, Defendant - President Kellpro, Inc. National website
www1.odcr.com/Continued:**

Not only is this report a lie but a potential group act to a fraud; whether intentional or by acts in error. In regard to the ticket for DUS/driving under suspension with www.1.odcr.com report of this lie, they are presenting themselves as a co-perpetrator of this illegal act. Department of Public Safety said I had driver's license in 1994, where did DUS come from? **See /www1.odcr.com details and their update listing 03/2019; Mary K Johnson TR-1994-02808 and Mary K Johnson TR-1994-02809**

Mr. Keller's website, just like Wagoner County has caused me great harm and maybe even endangered my life by this lie with no regard to the truth.
Coffin vs. U.S. (1894) appears very old but even in 2019 the concept of innocent until proven guilty has escaped me in Wagoner County and all these defendants, especially www1.odcr.com. They have used their adverse action reports and behavior to harm me.

Again, I ask you to consider Oklahoma's *Department of Public Safety "To preserve your rights and privacy under the Driver's Privacy Protection Act, 18 U.S.C., Sections 2721 through 2725"***18 U.S. Code § 2724. Civil action**

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Michael Keller, Defendant - President Kellpro, Inc. National website
www1.odcr.com/Continued:

[*Baker v. Los Angeles Herald Examiner* (1986) 42 Cal.3d 254, 260.] The dispositive question is whether a reasonable person could conclude that the published statements imply a probably false factual account. [*Moyer v. Amador Valley J. Union High School Dist.* (1990) 225 Cal.App.3d 720, 724 – 725.]

Zach 4:6.

The Department of Public Safety reported that as of 1997 to present I am eligible to change my Texas DL back to Oklahoma, their report to me did not support a negative history or adverse action concerning payments due to The State of Oklahoma. I request a jury trial in this matter for relief of an obvious matter of fact; that a malicious intent to defraud, defame and harm me has been carried out since 2001 and the statute of limitations, I pray is moot because the illegal activity is ongoing todate.

Again, I ask you to consider Oklahoma's *Department of Public Safety* "To preserve your rights and privacy under the Driver's Privacy Protection Act, 18 U.S.C., Sections 2721 through 2725" **18 U.S. Code § 2724. Civil action ; 4th, 5th, 6th, 8th and 14th Amendment rights, Fair Credit Reporting Act and Title VII, discrimination.**

Wikipedia information reported libel actions contain false and unprivileged publication by writing, picture, effigy, or other fixed representation to the eye which exposes any person to hatred, discrimination, contempt, ridicule; which caused him/her to be avoided or shunned, or which has a cause that can injure an occupation. I believe Mr. Keller's website has injured me in a national way, causing harm to me as a United States Citizen.

UNITED STATES DISTRICT COURT For the Eastern District of Oklahoma
Honorable Ronald A White, Chief Judge – Patrick Keaney, Clerk of Court
Case No. _____ Complaint Page Twenty (20)

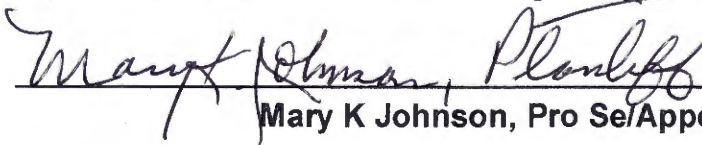
Mary K Johnson, Pro Se vs Wagoner County, et al

Background of Defendant(s) to this complaint/Statement of Facts

I attest, swear and/or affirm that the aforementioned information presented in this complaint by me; **Mary K Johnson, Pro Se, Plaintiff/Appellant** regarding these defendants:

- *Wagoner County, et al (Wagoner County, Board of Commissioners)*
- *Patti Oertle-Phaneuf, Defendant - President - D.B.A/The Key Group, Inc.*
- *Martin A. Vaughn, Defendant/Incorporator/ Estate of Martin A. Vaughn, Deceased or D.B.A Pertusa Energy or Incorporation Agent for - National Background Reporting*
- *Michael Keller, Defendant - President Kellpro, Inc.*

is true and correct to the best of my knowledge and remembrance of this life experience, as a statement of fact regarding this complaint.



Mary K Johnson, Pro Se/Appellant/Plaintiff

State of Oklahoma

The foregoing instrument was acknowledged before me this _____ day
of _____, 20____, at _____,

Signature of Notary Public

Name of Notary Public (print your name and title)

State of Oklahoma; My Commission Expires _____

SEAL